

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,	§	
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
COMMSCOPE HOLDING COMPANY,	§	
INC., COMMSCOPE INC., ARRIS	§	
INTERNATIONAL LIMITED, ARRIS	§	
GLOBAL LTD., ARRIS US HOLDINGS,	§	Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§	(Lead Case)
TECHNOLOGY, INC., and ARRIS	§	
ENTERPRISES, LLC,	§	
	§	
NOKIA CORP., NOKIA SOLUTIONS	§	
AND NETWORKS OY, and NOKIA OF	§	Civil Action No. 2:21-cv-309-JRG
AMERICA CORP.	§	(Member Case)
	§	
Defendants.	§	

**TQ DELTA, LLC’S UNOPPOSED MOTION TO
EXTEND THE DEADLINE FOR VENUE DISCOVERY**

Now comes, Plaintiff TQ Delta, LLC (“TQ Delta”) and respectfully moves for a one-day extension of time, up to and including February 8, 2022, for venue discovery related to Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC’s (“CommScope”) Motion to Transfer Venue to the District of Delaware (“Motion to Transfer Venue”). Dkt. No. 32. In support of its Motion, TQ Delta would respectfully show the Court as follows:

On December 22, 2021, the Court entered an Order (Dkt. No. 63) setting February 7, 2022, as the deadline for venue discovery related to CommScope’s Motion. TQ Delta requests a one-day

extension of that deadline to February 8, 2022, solely for the purpose of presenting its Rule 30(b)6 representative for deposition on topics related to venue in this matter.

TQ Delta has met and conferred with CommScope's counsel, and CommScope does not oppose the relief requested in this Motion. The parties have stipulated that this Motion, if granted, will not change TQ Delta's deadline for filing its brief in response to CommScope's Motion to Transfer Venue. TQ Delta's deadline for filing its response brief will remain February 22, 2022.

Plaintiff TQ Delta respectfully requests that the Court extend the deadline for venue discovery by one day, up to and including February 8, 2022.

Dated: February 3, 2022

Respectfully submitted,

By: /s/ William E. Davis, III
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**ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this February 3, 2022, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/William E. Davis, III
William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the CommScope Defendants are unopposed to this motion.

/s/William E. Davis, III
William E. Davis, III